

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

United States of America

v.

ELVIS VASQUEZ-ZAMORANO

Defendant(s)

Case No. 1:25-mj- 36

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 13 February 2025 in the county of Hamilton in the
Eastern District of Tennessee, the defendant(s) violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

Reentering the United States without the prior express consent of the Secretary of Homeland Security after having been previously removed from the United States.

This criminal complaint is based on these facts:

See attached affidavit, which is incorporated herein.

☒ Continued on the attached sheet.



Complainant's signature

Kasey Williams, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/13/2025



Judge's signature

City and state: Chattanooga, Tennessee

Hon. Christopher H. Steger, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

AFFIDAVIT IN SUPPORT OF A)	
CRIMINAL COMPLAINT AGAINST)	CASE NO. 1:25-mj- 36
ELVIS VASQUEZ-ZAMORANO)	
FOR VIOLATIONS OF 8 U.S.C. § 1326)	

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Kasey Williams, being duly sworn, state the following:

1. I am a Special Agent with Homeland Security Investigations (HSI) assigned to the Chattanooga Field Office. I conduct investigations of matters within the jurisdiction of U.S. Immigration and Customs Enforcement (ICE) in the Eastern District of Tennessee. I have been employed as an HSI Special Agent since 2022. In the performance of my duties, I have conducted and participated in numerous investigations of federal immigration violations. I have received specialized training in immigration and customs enforcement, criminal investigations, case development, investigation techniques, and other standardized methods of investigation regarding immigration violations.

2. I submit this affidavit for the limited purpose of establishing probable cause that Elvis VASQUEZ-ZAMORANO has violated 8 U.S.C. § 1326(a) by being found in the United States after having been previously removed and without having obtained the express consent of the Secretary of Homeland Security to reapply for admission.

3. The statements in this affidavit are based on my personal knowledge, official reports and records, and information provided to me by other law enforcement officers. Because this affidavit is submitted for a limited purpose, I have not included every fact known to me concerning this investigation. I have set forth only those facts necessary to support probable cause for the requested criminal complaint.

4. On or about 13 February 2025, I encountered Elvis VASQUEZ-ZAMORANO within the Eastern District of Tennessee, specifically, Hamilton County. He was attending a probation and parole meeting at the Tennessee Department of Correction (TDOC) Probation and Parole Office, confirming that he was present in the United States. I verified the identity of VASQUEZ-ZAMORANO via a fingerprint match to ICE Alien File (A-file) number "A 206 513 109." This A-file showed that VASQUEZ-ZAMORANO is a citizen and national of Mexico and not a citizen or national of the United States.

5. According to this A-file, VASQUEZ-ZAMORANO was previously ordered removed from the United States to Mexico by an expedited removal order issued on or about 11 May 2013. VASQUEZ-ZAMORANO's removal stemmed from an encounter with Border Patrol in Hidalgo, TX, where he was determined to be a citizen of Mexico, present in the United States without admission. VASQUEZ-ZAMORANO was removed to Mexico on 16 May 2013. VASQUEZ-ZAMORANO was previously ordered removed from the United States to Mexico by a reinstatement of deportation served on or about 22 April 2019. VASQUEZ-ZAMORANO was removed to Mexico on 05 May 2019. Prior to these removals, on 29 April 2010, VASQUEZ-

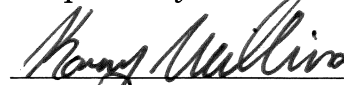
ZAMORANO was given a voluntary return to Mexico, following an encounter with Border Patrol in Tucson, AZ.

6. Additionally, VASQUEZ-ZAMORANO was convicted of possession of methamphetamine for resale on 31 October 2024, for which he was sentenced to serve three years of TDOC supervised probation.

7. I have examined the documentation in VASQUEZ-ZAMORANO's A-file and have found no evidence that he ever sought or received permission from the Secretary of Homeland Security to reenter the United States following his prior removals.

8. Based on the foregoing, I believe there is probable cause to conclude that Elvis VASQUEZ-ZAMORANO has reentered and been found in the United States without having obtained the express consent of the Secretary of Homeland Security. In other words, he is unlawfully present in the United States following a prior deportation in violation of 8 U.S.C. § 1326(a). Accordingly, I respectfully request that a Criminal Complaint be issued in conjunction with an arrest warrant for Elvis VASQUEZ-ZAMORANO.

Respectfully submitted,



KASEY WILLIAMS
HSI SPECIAL AGENT

Sworn to and subscribed before me this 13th day of February 2025.



HON. CHRISTOPHER H. STEGER
UNITED STATES MAGISTRATE JUDGE